

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

Bodyguard Productions, Inc.

Plaintiff,

VS.

Pacific DirectConnect, Inc.

Defendant.

**Case No.: 1:19-cv-**  
**(Copyright)**

# DECLARATION OF DANIEL ARHEIDT

## DECLARATION OF DANIEL ARHEIDT

Daniel Arheidt, hereby declares under penalty of laws of the United States of America that the following is true and correct:

1. I am over the age of 18 and am competent to make this declaration.

This declaration is based upon my personal knowledge and the facts stated therein are true and accurate.

2. I am an employee of Maverickeye UG (“MEU”), a company incorporated in Eggenstein and organized under the laws of Germany, in its technical department. MEU is in the business of providing forensic investigation

services to copyright owners. As a part of my regular duties I oversee the database and records maintained by MEU.

3. MEU monitors peer-to-peer/BitTorrent networks for acts of distribution of Plaintiff's motion picture through the use of proprietary MaverikMonitor™ software.

4. In general, BitTorrent operates with a number of parties joining in a swarm to both download files and share/upload files with other swarm members, commonly called peers.


5. Members of a swarm broadcast, or register their Internet protocol ("IP") address with Trackers, hosted by third parties, and Distributed Hash Tables ("DHT's"), generally hosted by the members of a swarm of peers, to allow them to be located and to locate other members sharing a distinct file.

6. Both Trackers and DHT's are publicly broadcasted resources for anyone who wishes to locate and join a swarm to download a file. Files can be movies, T.V. shows, software or any available information being uploaded or distributed. In essence, Trackers and DHT's are the 'phone books' or lists of IP addresses where uploaders/peers register as being a resource for others to download a specific file, or where they look to find lists of others from whom they may download a file.

7. I have reviewed the MaverikMonitor evidence logs, and can confirm the records of infringing activity set forth on Exhibit "2" to the Complaint, including IP addresses, times, and hash values, accurately reflect instances of actual observed distribution of Plaintiff's motion picture by the infringing IP address.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: Eggenstein, Germany, 1 day of August, 2019.

A handwritten signature in black ink, appearing to read 'Daniel Arheidt', written over a horizontal line.

Daniel Arheidt